

420 Lexington Avenue
New York, NY 10170
www.mta.info

Catherine A. Rinaldi
President



Metro-North Railroad

August 31, 2021

The Honorable Ronnie Abrams, U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
Courtroom 1506
New York, NY 10007

Re: Umar Wright v. Metro North Railroad Company
21-cv-871 (RA)(PTW)
Joint Request for Extension of Time

Dear Judge Abrams:

Please allow this correspondence to serve as a joint request for a ninety (90) day extension of all deadlines and adjournment of the September 10, 2021 status conference. The fact discovery deadline is September 10, 2021. Please also note that I am also requesting the adjournment of the September 10, 2021 conference since I am scheduled to be on vacation at that time.

This is the first request for adjournment or extension of time by either party. I have communicated with Sean Constable, counsel for plaintiff, Umar Wright, and he joins in this request. A proposed Revised Case Management Plan below reflects the ninety (90) day extension.

Both parties provided initial disclosures. Written discovery has been served and answered by Metro-North. Plaintiff needs additional time to serve his responses to the Defendant's demands which Defendant has no objection to same. Plaintiff still needs to identify all the medical providers so that authorizations could be forwarded to the Defendant. Metro-North needs to obtain these medical records before conducting a fruitful deposition.

Extending all relevant dates by ninety (90) days would not prejudice any party, and in fact would help facilitate a possible resolution of the case before trial. Therefore, all parties respectfully request a ninety (90) day extension of all existing deadlines in order to complete discovery.

Wright v. Metro-North
Letter to Court
August 31, 2021
Page 2 of 2

PROPOSED CASE MANAGEMENT PLAN

Fact discovery and depositions shall be completed no later than December 10, 2021.

Plaintiff's expert reports due January 28, 2022.

Defendant expert reports due February 28, 2022.

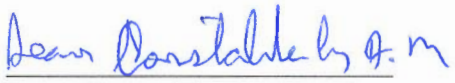
All discovery deadline shall be completed no later than June 22, 2021.

Depositions of experts to be completed by March 21, 2022.


The Court will conduct a post-fact discovery conference on _____. No later than a week in advance of the conference, the parties are to submit a joint letter updating the Court on the status of the case.

We thank Your Honor for your time and consideration. We will make ourselves available at your Honor's convenience.

FLYNN & WIETZKE, P.C.

BY: 
Sean Constable, Jr., Esquire
1205 Franklin Avenue, Suite 370
Garden City, NY 11530
Tel No.: 516-877-1234

**METRO-NORTH COMMUTER
RAILROAD COMPANY**

BY: 
Alan Muraidekh, Esquire
(AM-6140)
420 Lexington Avenue, 11th Floor
New York, New York 10170
amuraidekh@mnrt.org


Attorneys for Plaintiff

Umar Wright

(Attorneys for Metro-North)

Application granted. The proposed case management plan is adopted with the following modification: the "all discovery deadline" is set to June 22, 2022. A post-fact-discovery conference will be held December 17, at 10:30 a.m. No further adjournments will be granted absent good cause.

SO ORDERED.


Hon. Ronnie Abrams
09/01/21